



*On Tuesday, May 23, 2006, the Minerals Management Service (MMS) of the U.S. Department of the Interior held a public hearing in Trenton. The hearing was one of a number of sessions scheduled to gather suggestions for the scope of an Environmental Impact Statement (EIS) for alternate energy generating facilities proposed for federal waters on the Outer Continental Shelf (OCS). The comments will be considered as MMS determines an appropriate EIS review process for these proposals.*

### **Environmental Planning for Off-Shore Renewable Energy Proposals May 23, 2006**

The economics of energy today may promote an explosion in the development of renewable energy. This development holds great promise for the environment. But to achieve this promise, we must be vigilant in considering the full range of potential consequences from alternative energy proposals on the Outer Continental Shelf.

New Jersey supports offshore alternative energy as long as it does not unreasonably affect our natural resources or our tourism economy.

For New Jersey, the shore is an environmental treasure that unites us. An appreciation of the shore is a core part of what it means to be from New Jersey. Shore-related tourism is also an economic engine contributing \$22 billion annually to our state's economy.

As you define the range of issues to be considered for offshore energy proposals, I urge you to undertake a comprehensive review of potential consequences. The risk to our economy and this natural treasure are too great to do anything less.

New Jersey has identified a number of specific issues that must be included in an Environmental Impact Statement (EIS) if it is to be comprehensive. These concerns are informed by the extensive work recently completed by a panel appointed by the Governor to consider proposals for offshore wind generation in state waters.

These concerns are not meant to be obstacles to the development of offshore energy. The Governor's panel stated plainly in its findings that:

- New Jersey faces a serious and growing energy crisis that cannot be ignored.
- New Jersey must be a leader in developing clean, renewable sources of energy.
- New Jersey must face its energy problems with bold action on multiple fronts.

The panel also found that:

- Based on information available today, offshore wind turbine technology offers a range of potential benefits and possible drawbacks.
- Too much remains unknown to characterize the appropriateness of offshore wind development for New Jersey's coastal waters.

With the guidelines you establish, you can help fill the void regarding the impact of offshore energy facilities.

Among New Jersey's concerns, as laid out by the Wind Panel, is the lack of baseline studies for a variety of species potentially affected by the construction of offshore facilities. These species include birds, fish, marine mammals and reptiles, some of which are endangered or threatened. Essential habitat, behavioral responses to habitat alterations and/or migration patterns will help inform decisions regarding proper placement of offshore facilities and should be included in an EIS.

In assessing the viability of offshore energy generation, an EIS should also include information about the cumulative impact of siting decisions and require an alternatives analysis to provide a clear understanding of the costs – both economic and non-economic – and benefits of an individual project.

The limited contribution an individual project may make to meet our energy needs may also be achieved more economically and in a more environmentally sound manner through alternative means – conservation, energy efficiency and other demand side management strategies, for example. An alternatives analysis can help identify the true environmental cost of a project, and should be a requirement.

The socio-economic impact of proposed development must also weigh heavy on the decision of where these offshore facilities should be sited. The shore is a great economic engine for New Jersey. A comprehensive review must include an assessment of how a proposal will affect transportation and recreational and commercial fishing. The mapping of navigation routes and prime fishing locations is critical to ensure siting decisions do not adversely affect the local economy.

In addition, coastal areas tend to be heavily developed and expensive property. The siting of offshore facilities may affect property values and potentially raise environmental justice issues and so these possible effects must be explored as well.

Perhaps most difficult of these socio-economic issues is the aesthetic impact of the siting decision. Tourism at the shore supports innumerable small businesses and provides tourists with a relatively affordable opportunity for a family vacation. There has been speculation as to how people might react to an offshore facility, but no hard data has been developed. We need to expand our knowledge if we are to make a responsible decision.

I recognize that many of these concerns are on your radar screen and have been discussed in White Papers you have issued. I raise them today because they are priority concerns for us in New Jersey.

The state will also provide written comments to this panel that elaborates and expands on these comments.

I also wish to repeat key findings of our state's wind panel: New Jersey recognizes that we face a serious and growing energy crisis that cannot be ignored and New Jersey must be a leader in developing clean, renewable sources of energy. The panel even went so far as to recommend a federal/state, public /private partnership to establish a pilot project to explore the use of large-scale offshore wind.

Our reliance on fossil fuels has threatened our environment, our economy and our national security. We must pursue alternatives, but we must do it carefully.

In considering proposals to generate energy from alternative sources off the Outer Continental Shelf, let us not be blind to the potential for unintended consequences. Let us require a comprehensive EIS for such projects, and then proceed secure in the knowledge that we have fully considered the potential problems of such proposals and the alternatives.